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July 15, 2021

BY ECF

Hon. Kimba M. Wood
United States District Judge
United States District Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Arnold Levine
19 Cr 810 (KMW)

Dear Judge Wood:

This letter is respectfully submitted on behalf of the defendant, Arnold Levine, to request an adjournment of his sentencing, which is currently scheduled to take place before Your Honor on August 17, 2021.

On July 1, 2021, Your Honor appointed me to represent Mr. Levine, substituting for Marne Lenox, Esq., of the Federal Defenders. Shortly after my appointment, Ms. Lenox provided me with her file on the case, which I reviewed in advance of meeting with Mr. Levine. This afternoon, I was able to meet with Mr. Levine to discuss the case and how he wants to proceed. Based on our conversation, Mr. Levine is prepared to proceed to sentencing as soon as I am able to perform the background investigation that I need to do in order to prepare an appropriate sentencing submission on his behalf. In that regard, I will need to obtain records relating to Mr. Levine's mental health history and treatment, which is likely to take some time. Additionally, I am scheduled to be on trial during September and October and thus will be unable to work on this matter during that period of time. Accordingly, it is respectfully requested that the Court reschedule Mr. Levine's sentencing for a date in late November or early December that is convenient to the Court and the parties. Such an adjournment will provide me with sufficient time to complete the work that is required to prepare a sentencing submission while not interfering with my trial schedule.

I have discussed this request with AUSA Rothschild who advised me that the Government has no objection to the requested adjournment.

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Thank you in advance for your consideration of this request.

Respectfully submitted,

Avraham C. Moskowitz

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cc: AUSA Sam Rothschild (by e-mail)

Sentencing is adjourned to November 22, 2021, at 11:00a.m. Defendant's submission is due by November 8. Government submission is due by November 15.

SO ORDERED: N.Y., N.Y.

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.